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Counsel for Defendant
Nikola Corporation

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF ARIZONA**

18 The Lion Electric Company, a Canadian
19 corporation,
20 Plaintiff,

21 v.

22 Nikola Corporation, a Delaware
23 corporation,
24 Defendant.

Case No. 2:23-cv-00372-PHX-DGC

[PROPOSED] RULE 502(d) ORDER

25 1. The production of privileged or work-product protected documents,
26 electronically stored information (“ESI”) or information, whether inadvertent or otherwise,
27 is not a waiver of the privilege or protection from discovery in this case or in any other
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1 federal or state proceeding. This Order shall be interpreted to provide the maximum
2 protection allowed by Federal Rule of Evidence 502(d).

3 2. Nothing contained herein is intended to or shall serve to limit a party's right
4 to conduct a review of documents, ESI or information (including metadata) for relevance,
5 responsiveness, and/or segregation of privileged and/or protected information before
6 production.

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8 SO ORDERED

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10 Date: _____, 2023

11 Hon. David G. Campbell
12 Senior United States District Judge
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